

**UNITED STATE DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

TYSON HOBAN,

Plaintiff,

v

Case No. 2:18-CV-12011-TGB-APP

Hon. Terrence G. Berg

Mag. Judge Anthony P. Patti

KEVIN SPRAGUE, a Genesee County Sheriff
Department Sergeant, in his individual capacity,
GRIFFIN LLOYD, a Genesee County Sheriff
Department Deputy, in his individual capacity,
and MARK ZILINSKI, a Genesee County Sheriff
Department Deputy, in his individual capacity,

Defendants.

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STIPULATED PROTECTIVE ORDER

This matter having come on before the Court upon stipulation of counsel for Plaintiff and Defendants and the Court being fully advised in the premises,

IT IS HEREBY ORDERED that the following materials will be produced subject to this Protective Order and shall be used solely and exclusively for the purposes of the instant lawsuit and can be used in any and all court filings, judicial proceedings, depositions, alternative dispute resolution proceedings, trial and/or any other judicial related proceedings solely and exclusively. The documents subject to this Protective Order shall not be used in or for any other case, proceeding, dispute or for any commercial business or competitive purpose whatsoever. The documents provided pursuant to this Protective Order may be disclosed only to those individuals and/or entities identified in this Protective Order and must be used only by those individuals and/or entities identified in this Protective Order and must only be used for purposes of this litigation. This Protective Order refers to the following documents:

1. Internal investigation report by Undersheriff Christopher Swanson;
2. Request for internal investigation by Captain Jason Gould;
3. Transcript of internal interview with Deputy Griffin Lloyd;
4. Transcript of internal interview with Sergeant Kevin Sprague;
5. Transcript of internal interview with Deputy Mark Zilinski;

6. Summary of the discipline hearing for Deputy Lloyd;
7. Notice of disciplinary action to Deputy Lloyd;
8. Acknowledgment of *Garrity Rights* signed by Kevin Sprague, Griffin Lloyd, and Mark Zilinski.
9. Other documents, if any, not specified above that were included in the materials requested by Plaintiff's Counsel referred to as "the internal investigation report that the Genesee County Sheriff's Department completed in response to the incident" that were ordered to be produced in this Court's "Order Denying Motion To Quash".

IT IS FURTHER ORDERED that nothing in this Protective Order shall prevent any party from filing a motion for modification of the Protective Order.

IT IS FURTHER ORDERED that this Protective Order shall survive and remain in full force and effect until the entry of final judgment (including any appellate proceedings) in this case, whether by settlement or litigation, unless otherwise ordered by the Court.

IT IS FURTHER ORDERED that the documents produced under the Protective Order do not constitute an admission and/or agreement that any such document is admissible as evidence in the case. Determinations of evidence admissibility will be made by the Court in separate proceedings.

IT IS FURTHER ORDERED that the documents produced pursuant to this Protective Order shall be destroyed by Plaintiff and/or Defendants' counsel after final disposition (including all appeals) of the case except any documents attached

to any pleadings filed with the Court, deposition exhibits or other pleadings.

IT IS SO ORDERED.

/s/Terrence G. Berg

TERRENCE G. BERG

UNITED STATES DISTRICT JUDGE

Dated: July 31, 2019

We stipulate and agree to the entry of the above Order:

LAW OFFICE OF GREGORY T.
GIBBS

McGRAW MORRIS P.C.

/s/ GREGORY T. GIBBS

GREGORY T. GIBBS (P26440)

Attorney for Plaintiff

/s/G. GUS MORRIS

G. GUS MORRIS (P32960)

Attorney for Defendants